

THE CITY OF NEW YORK

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June 11, 2021

VIA ECF

JAMES E. JOHNSON

Corporation Counsel

The Honorable Ann M. Donnelly United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: Felipe Rodriguez v. City of New York, et. al., 21 Civ. 1649 (AMD)(RLM)

Your Honor:

I am a Senior Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, representing defendants City of New York, Sgt. George Zaroogian (Ret.) Det. John Beisel (Ret.), Det. John Califano (Ret.), Det. Jerry Fennel (Ret.) and John Wilde (Ret.) in the above referenced matter. We write with the consent of plaintiff's counsel to respectfully request that the summonses at Dockets 1-6, 1-8, 1-9 and 1-10 herein be sealed for the reasons that they have former police detective defendants' purported private residential addresses. Plaintiff eventually proceeded by waiver of summons as to each defendant and these defendants have all appeared in the case. As such, it is unnecessary for these defendants to have their purported home addresses on ECF.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman Mark D. Zuckerman Senior Counsel

cc: All Counsel (via ECF)